

Privacy Policy

This Privacy Policy contains an overview about the collection, use and disclosure your personal data. In case the information covers only one of our services we will explicitly point this out to you. Please check the Customer Agreement for the meaning of defined words (those with capital letters).

Please read this Privacy Policy carefully as it applies when you use our Services or visit our Website or use our App. We take privacy and protection of data seriously and are committed to handling the personal information of those we engage with, whether customers, suppliers or colleagues, responsibly and in a way that meets the legal requirements of the countries in which we operate.

1. Who we are

EZREEZ LLC. ("EZREEZ", "us", "we", "our") is responsible for the collection, use and disclosure of your personal information. If you

2. Data we collect about you

We will collect the following data about you:

- 2.1 Information you give us.
 - (a) You may give us information, including personal information, about yourself when you sign up to use our Services, e.g. your name, phone number and email address. This also includes information you provide through your continued use of our Services, participate in discussion boards or other social media functions on our Website or App, enter a competition, promotion or survey, and when you report a problem with our Services. The information you give us may include your name, address, e-mail address, phone number, financial information (including credit card, debit card, or bank account information), payment reason, geographical location, social security number, personal description and photograph.
 - (b) We may also need additional commercial and/or identification information from your e.g., if you send or receive certain high-value or high-volume transactions or

as needed to comply with our anti-money laundering obligations under applicable law.

- (c) In providing the personal data of any individual (other than yourself) that for example may receive payments from us as part of your use of our Services, you promise that you have obtained consent from such individual to disclose his/her personal data to us, as well his/her consent to our collection, use and disclosure of such personal data, for the purposes set out in this Privacy Policy.
- **2.2 Information we collect about you.** With regard to your use of our Services, we may automatically collect the following information, some of which may be or include personal information:
 - (a) details of the transactions you carry out when using our Services, including geographic location from which the transaction originates;
 - (b) technical information, including the internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, phone operating system, time zone setting, browser plug-in types and versions, operating system and platform;
 - (c) information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our Website or App (including date and time); products you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our Customer Support number.
- **2.3 Information we receive from other sources.** We may receive information about you if you use any of the other websites we operate or the other services we provide. We are also working closely with third parties and may receive information about you from them.

For example:

- (a) the banks you use to transfer money to us will provide us with your basic personal information, such as your name and address, as well as your financial information such as your bank account details;
- (b) business partners may provide us with your name and address, as well as financial information, such as card payment information;
- (c) advertising networks, analytics providers and search information providers may provide us with pseudonymised information about you, such as confirming how you found our website;
- (d) credit reference agencies do not provide us with any personal information about yourself but may be used to corroborate the information you have provided to us.

2.4 Children's data

Our products and services are directed at adults 18 years and over and not intended for children. We do not knowingly collect information from this age group. Part of the verification process prevents EZREEZ collecting such data. If any information is collected from a child without verification of parental consent, it will be deleted.

3. How we protect your personal information

- **3.1 We use a secure server to store your personal information. All information you provide to us is stored on our (or our financial partners secure servers). Any payment transaction information will be encrypted using Transport Layer Security technology.
- **3.2 As you will know, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal information, we cannot guarantee the security of your information during transmission, and any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

We continuously educate and train our employees about the importance of confidentiality and privacy of customer personal information. We maintain physical, electronic and procedural safeguards that comply with the relevant laws and regulations to protect your personal information.

4. Uses made of the information

- 4.1 We use your information in the following ways:
 - (a) to carry out our obligations relating to your contract with us and to provide you with the information, products and services;
 - (b) to comply with any applicable legal and/or regulatory requirements including laws outside of your country of residence or to comply with any legal process;
 - (c) to notify you about changes to our Services;
 - (d) to customise our Services and the information we provide to you, and to address your needs - such as your country of address and transaction history. For example, if you frequently send funds from one particular currency to another, we may use this information to inform you of new product updates or features that may be useful for you;

- (e) as part of our efforts to keep our Services safe and secure;
- (f) to administer our Services and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- (g) to improve our Services and to ensure that they are presented in the most effective manner;
- (h) to measure or understand the effectiveness of advertising we serve and to deliver relevant advertising to you;

- (i) to allow you to participate in interactive features of our Services, when you choose to do so;
- (j) to allow us to pursue available remedies or limit the damages that we may sustain and to enforce our terms and conditions
- (k) so that we can provide you with information regarding our public policy advocacy efforts.
- (l) to provide you with information about other similar goods and services we offer;

- (m) to provide you, or permit selected third parties to provide you, with information about goods or services we feel may interest you; or

- (n) to combine information we receive from other sources with the information you give to us and information we collect about you. We may use this information and the combined information for the purposes set out above (depending on the types of information we receive).

5. Disclosure of your information

- 5.1 We may share your information with selected third parties including:
 - (a) affiliates, business partners, suppliers and subcontractors for the performance and execution of any contract we enter into with them or you;
 - (b) advertisers and advertising networks solely to select and serve relevant adverts to you and others;
 - (c) analytics and search engine providers that assist us in the improvement and optimisation of our site; and
 - ~~(d) our group entities or subsidiaries~~

- 5.2 We may disclose your personal information to third parties:
 - (a) affiliates, business partners, suppliers and subcontractors for the performance and execution of any contract we enter into with them or you;
 - (b) in the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets;
 - (c) if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our Customer Agreement and other applicable agreements; or to protect the rights, property, or safety of Wise, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction;
 - (d) to assist us in conducting or co-operating in investigations of fraud or other illegal activity where we believe it is reasonable and appropriate to do so;
 - (e) to prevent and detect fraud or crime;
 - (f) in response to a subpoena, warrant, court order, or as otherwise required by law;
 - (g) to assess financial and insurance risks, and to protect our operations and those of any of our affiliates;
 - (h) to allow us to pursue available remedies or limit the damages that we may sustain
 - (i) to recover debt or in relation to your insolvency; and
 - (j) to develop customer relationships, services and systems.

 - **5.3** We do not have a published list of all of the third parties with whom we share your data with, as this would be heavily dependent on your specific use of our Services. However, if you would like further information about who we have shared your data with, or to be provided with a list specific to You, you can request us through email.
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6. Retention of your information

- **6.1** EZREEZ is required by law to store some of your personal and transactional data beyond the closure of your account with us. Your data is only accessed internally on a need to know basis, and it will only be accessed or processed if absolutely necessary.

- **6.2** We will always delete data that is no longer required by a relevant law or jurisdiction in which we operate.

7. Third-party links

- **7.1** Our Services, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility for them.

8. Changes to our privacy policy

- **8.1** To keep up with best practices, new legislation, and changes in how we collect and use personal information, we may modify this Privacy Policy from time to time. If we make changes to this Privacy Policy, we will post the revised Privacy Policy on the website. To stay up to date on any changes, please check back periodically. Your use of our services following these changes means that you accept the revised Privacy Policy.